

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

GAMALIER RIVERA,	)	
	)	
<i>Plaintiff,</i>	)	Case No. 23 C 01743
	)	
v.	)	Hon. Judge Edmond E. Chang
	)	District Judge
	)	
REYNALDO GUEVARA, <i>et al.</i> ,	)	Hon. Judge Sunil R. Harjani
	)	Magistrate Judge
<i>Defendants.</i>	)	
	)	
	)	<b>JURY TRIAL DEMANDED</b>
	)	

**JOINT STATUS REPORT**

The parties, by their respective undersigned counsel, and pursuant to the Court's September 14, 2023, Order (Dkt. 53), respectfully submit the following joint status report:

**1. Discovery**

a. The Parties have submitted their Rule 26(a) disclosures and exchanged written discovery.

b. Plaintiff has noticed and served three depositions of third-party witnesses. Defendant Guevara has also noticed several third party witness depositions and is in the process of locating these witnesses to serve them. The parties are in the midst of an extensive Rule 37 conferral regarding questioning order and timing of these depositions and are aiming to resolve these issues without court intervention. Defendant Officers issued subpoenas to the Illinois Department of Corrections, Cook County Department of Corrections, Cook County Public Defender's Office, and the Cook County State's Attorney's Office, which counsel for Plaintiff advised he had certain objections. The parties are engaging in Rule 37.2 conferences to resolve the

objections.

## 2. Settlement

1. Plaintiff believes that early discussion of settlement of this matter would be beneficial, and he would welcome a settlement conference.

2. The City is not in a position to engage in settlement negotiations at this time. Sufficient discovery has not occurred for the City to fully evaluate the case.

Dated: November 30, 2023

Respectfully Submitted,

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/s/ Eileen E. Rosen  
*Counsel for the City of Chicago*

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**CERTIFICATE OF SERVICE**

I, Meg Gould, an attorney, certify that on November 30, 2023, I filed the foregoing JOINT STATUS REPORT using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Meg Gould  
*One of Plaintiff's Attorneys*